

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS EMILY ROSENBERG
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES
APWU/USPS-T3-26 AND 27**

The United States Postal Service hereby files the responses of witness Emily Rosenberg to the above-listed interrogatories of the Public Representative dated February 23, 2012, respectively. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-T3-26. Please refer to USPS Library Reference N2012-1/13, tab 'CANC', columns J and L.

- a) Please confirm that column J reports ODIS volumes, and column L reports MODS cancellation piece handling volumes. If you do not confirm, please explain what volumes column J and L do report, and how these volumes are derived.
- b) Please explain why the ratios of the column L volumes over the column J volumes vary from facility to facility. For example, the ratio of column L over column J volumes for Springfield MA P&DC is 2.50, whereas the corresponding ratios for Boston P&DC and Brockton P&DC are 3.20 and 2.35, respectively.

RESPONSE:

- (a) Not confirmed. Column J contains ODIS First-Class Mail single piece letter and card volume that was stamped. Column L contains MODS volume associated with letter cancellation operations.
- (b) I cannot explain why the ratios are different other than to point out that the two data systems, ODIS and MODS, are completely independent of each another. They rely on different means for data collection and reporting, which could account for the differences.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-T3-27: Please refer to USPS Library Reference N2012-1/13, tab 'CANC', columns D, E and N.

- a) Please confirm that any facility listed in column D but not in column E is a non-MODS facility that does cancellation of at least some of the mail originating from the 3-Digit ZIP Code it is responsible for. For example, row 57 reports Martinsburg, WV as a non-MODS facility that cancels at least some of the mail originating from ZIP 254. If you do not confirm, please explain what it means for a facility to be listed in column D but not in column E.
- b) For each facility listed in column D but not in column E, please confirm that the column N "FY10 MODS" volume is an estimate of the cancellation piece handlings this facility would have reported to the MODS database if it had been a MODS facility in FY 2010. If you do not confirm, please explain how to interpret the column N volumes reported for all facilities which are listed in column D but not column E.

RESPONSE:

- (a) Not confirmed. Column D contains the ZIP Code assignments received during a Mail Processing Survey conducted in 2010. The column D site was mapped to the representative column E site that performed letter cancellation in FY2010 when no cancellation processing data existed for the column D site. In the case of Martinsburg, no representative facility could be identified so Martinsburg represented itself.
- (b) Not confirmed. The volume in column N is an estimate of the letter cancellation volume in pieces for the 3-digit ZIP Code associated with the record.